

Before the  
POSTAL REGULATORY COMMISSION  
Washington, DC 20268-0001

GREETING CARD ASSOCIATION FOLLOW-UP INTERROGATORIES TO  
UNITED STATES POSTAL SERVICE WITNESS OWENS

Pursuant to Order No. 5875 and 39 CFR sec. 3020.116 and 3020.117, and with regard to United States Postal Service institutional witness Owens' response to GCA/USPS-1, the Greeting Card Association (GCA) submits follow-up interrogatories and/or requests for documents, as follows:

Follow-up Interrogatories to United States Postal Service Witness Owens – GCA/USPS-  
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The term "documents" includes (without limitation) letters, memoranda, telegrams, reports, studies, articles from periodicals, speeches, testimonies, books and extracts from books, pamphlets, tabulations, and work papers. In terms of format, "documents" includes written or printed records and disks, tapes, portable drives, or other recorded media, together with such written or printed material as is necessary to understand and use such disks, tapes, drives or other recorded media.

Any part of these interrogatories may be re-directed to other Postal Service witness(es), as necessary.

May 24, 2021

Respectfully submitted,

GREETING CARD ASSOCIATION

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GCA/USPS-2

2. Please refer to your response to GCA/USPS-1. In what follows, “purchased” transportation refers to costs reported under Cost Segment 14 in the Postal Service’s *Public Cost Segments and Components* report.

(a) Does the Postal Service employ a single cost-incurrence unit (e.g., ton-miles) to record the cost, for the First-Class Mail products listed under Cost Segment 14, of each of

- (i) Purchased domestic air transportation,
- (ii) Purchased domestic Alaska air transportation,
- (iii) Purchased highway transportation,
- (iv) Purchased rail transportation, and
- (v) Purchased domestic water transportation.

(b) If your answer to (a) is affirmative,

- (i) Please describe the unit employed for each mode listed in that part.
- (ii) With respect to each mode, may the unit employed for it be used to compare quantities of purchased transportation consumed as between different First-Class Mail products?

(c) If your answer to (a) is not an unqualified affirmative, please explain how the Postal Service calculates the costs reported under Cost Segment 14, for each mode, for each First-Class Mail product.